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Federal Communications Commission
Office of Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Amendment of Parts 2 and 15 of the Commission's Rules to Permit Use of Radio Frequencies Above 40 GHz for New Radio Applications	)	ET Docket No. 94-124
Petition of Sky Station International, Inc. for Amendment of the Commission's Rules to Establish Requirements for a Global Stratospheric Telecommunications Service in the 47.2-47.5 GHz and 47.9-48.2 GHz Frequency Bands	)	RM-8784

MOTION TO ACCEPT LATE-FIELD COMMENTS

Sky Station International, Inc. ("Sky Station") hereby moves the Commission to accept the attached late-filed comments of James A. Abrahamson, Lt.Gen USAF (Ret.) in the above captioned proceeding.

It was not possible to have the attached Comments of James A. Abrahamson, Lt.Gen USAF (Ret.) relating to the safety of Sky Station's proposed GSTS system until now. No party is prejudiced by these late-filed comments and Sky Station requests that the Commission accept them.

Respectfully Submitted,

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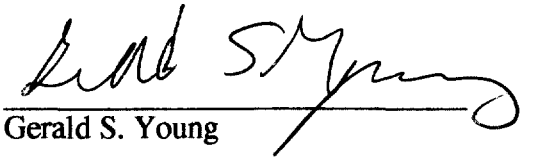
CERTIFICATE OF SERVICE

I, Gerald S. Young, a paralegal with the law firm of Mahon & Patusky, do hereby certify that copies of the foregoing Motion to Accept Late-Filed Comments and Declaration of James A. Abrahamson, Lt.Gen USAF (Ret.) were delivered by hand or were mailed this 12th day of July, 1996, via first class mail, postage prepaid, to the following:



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COMMENTS OF
JAMES A. ABRAHAMSON, Lt.Gen. USAF (Ret.)

I, James A. Abrahamson, make the following statement concerning the public safety qualifications of the stratospheric telecommunications platforms proposed by Sky Station International, Inc. ("SSI"):

1. I am qualified to comment on the safety specifications of SSI's proposed telecommunications system in light of my experience with nearly every facet of aviation technology over the course of my career.

2. Much of my full Air Force career was spent in research and development of flight technology. I received my B.S. in Aeronautical Engineering from M.I.T. in 1955 and my masters in same in 1961 from the University of Oklahoma. My career in the military was highlighted by being the number two graduate of the Air Force Test Pilot School at Edwards Air force Base and an Outstanding Graduate of the Air Command and Staff College. I was also an F-100 fighter pilot in Vietnam and flew 49 combat missions. I served as the Spacecraft Project Officer managing the development, launch and initial deployment of the Vela -series of Nuclear Detection Satellites. In doing so, I was also the co-author of one of the nation's first orbital performance contract incentive concepts.

3. From 1967 to 1969, I was an astronaut-in-training with the Air Force Manned Orbiting Laboratory Program until it was canceled by the President in 1969. While I did not get to fly in space, I gained engineering and management experience in developing three major MOL flight vehicle simulators and in the

process, I developed and negotiated the first governmental simulator performance incentive contract that directly rewarded simulator operations and maintenance crews. After this program was canceled, I served as a staff member on the National Aeronautics and Space Council Staff where I directed a number of studies, coordinated the NASC's involvement in the United Nations Committee on Peaceful Uses of Outer Space and participated on the interagency committee that developed all the "space initiatives" for President Nixon for his initial U.S./Soviet summit (which led to the Apollo-Soyuz mission). I also commanded the 4950th Flight Test Wing at Wright-Patterson AFB in Ohio.

4. I am experienced in the successful development of complex new technology systems. I was responsible for the development of the Maverick air to ground "smart missile." I spent two years as Inspector General for the Air Force Systems Command and headed the F-16 multinational fighter program, taking that program through its development, initial production and early operational deployment phases. After spending two years as Chief of Staff for Systems of the Air Force Systems Command, I was invited by NASA to become the Associate Administrator for Space Flight, from 1981 to 1984, responsible for the Space Shuttle program, guiding it through 12 successful research and development and operational missions. Then , in 1984, President Reagan asked me to direct the Strategic Defense Initiative Program, commonly known as "Star Wars," which remains the nation's most complex research and development program. I directed SDI for five years until my retirement from the Air Force in 1989.

5. I was the recipient of a number of awards in the course of my service in the Air Force and after my retirement including the Defense Distinguished Service Medal with One Oak Leaf Cluster, the Air Force Distinguished Service Medal, the Department of Energy Exceptional Public Service Award, the Air Medal with One Oak Leaf Cluster and the Air Force Legion of Merit. I was also awarded the Norwegian Order of St. Olaf, the Dutch Order of the Orange Sword and the Belgian Order of King Leopold. My civilian awards include the Society of Mechanical Engineers -- Outstanding Engineer Award in 1984, the Goddard Space Flight Trophy in 1986, ARCS Man of the Year in 1986, the Gen. Hartinger Award in 1987, two time winner of the Daedalian Program Management Award, twice Air Force Association Ira C. Baker Award, and the RTCA Achievement Award in 1992.

6. My subsequent career in the private sector enhances my familiarity with the rigorous requirements for successful design, development, testing and operating of a system such as the one proposed by SSI. Serving as Executive Vice President for Corporate Development, as a member of the Office of the Chairman, and as a member of the Board of Directors of Hughes Aircraft Company, I helped to accelerate Hughes' diversification into non-defense, commercial and industrial markets. I later became president of the transportation sector of Hughes where I continued to build Hughes' existing relationship with General Motors by working on strategic business unit developments in systems engineering, including the development of "Intelligent Vehicle Highway Systems" telecommunications applications.

7. From 1992 until approximately twelve months ago, I served as Chairman of the Board of Oracle Corporation, sharing top executive responsibilities with Oracle founder Larry Ellison. At Oracle, I was responsible for helping to build Oracle's strategy, infrastructure, procedures and capability that will make it a $10 billion a year company by the end of the decade. I was also responsible for corporate quality, what is called "instrumenting the company." I have recently returned to aviation in my capacity as Chairman, CEO, President and founder of International Air Safety, L.L.C., a synergistic grouping of companies and joint ventures focused upon improving global air traffic management and air safety.

8. Throughout my career, I have pursued the achievement of the highest standards for quality and safety in technology research, design, development and operations. I have seen SSI's Corona ion engine in operation and am as impressed with its capabilities and the promise it holds as I am with the overall system design solutions proposed by SSI's engineers.

9. Concern for the safety of those on the ground is always a vital consideration when any aircraft, whether fixed-wing or lighter than air, is flown or deployed. As such, falling debris, unexpected descent, catastrophic loss, among other concerns, must be carefully examined and redundant control and safety design solutions implemented. As with any aircraft seeking authorization for deployment, SSI's lighter than air platforms will be required to meet stringent FAA safety specifications. Furthermore, given the absence of moving parts and flammable fuels on SSI's platforms, the moderate environmental conditions

existing in the stratosphere, and the company's proposed redundant safety systems, I am satisfied that the prospect of falling debris or sudden descent are even less likely than with the aircraft that fly our skies today. As a result, I do not believe that SSI's stratospheric telecommunications platforms will pose any significant safety concerns.

10. In my position of Chief Executive of International Air Safety, L.L.C., I have been requested by SSI to manage the company's systems integration, deployment and operational safety programs and I also have a financial interest in SSI. I am confident that neither safety nor environmental impacts will be compromised.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, understanding and belief.

Date: July 11, 1996

James A. Abrahamson